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April 27, 2018

Magistrate Judge Vera M. Scanlon  
United States Magistrate Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza  
Brooklyn, N.Y. 11201

Re: 360 Lounge, LLC et al. v. The City of  
New York, et al. Docket No.: 16 cv 4590  
(NG)(VMS)

Dear Magistrate Judge Scanlon:

According to the Order, discovery should've closed today. Unfortunately, plaintiffs attempt to avoid court intervention can no longer be avoided.

Plaintiff has complied with defendants' discovery requests months ago. Thus far, despite plaintiffs' patience, defendants' have turned over 75 pages of discovery without any video, tape recordings, text messages, etc. From the plaintiffs' perspective defendants' disclosures are woefully inadequate for the amount of times their businesses were visited including the on-going corruption scandal.

Therefore, plaintiff is motioning the court for an immediate discovery conference to facilitate the completion of discovery.

Respectfully submitted,

Eric Sanders (ES0224)

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